

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) KENNETH TUROCZI and
(2) TYRENE TUROCZI,

Plaintiffs,

vs.

(1) TRAVELERS COMMERCIAL
INSURANCE COMPANY,

Defendant.

Case No. 5:23-CV-00095-JD

PLAINTIFFS' SECOND MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

COME NOW Plaintiffs and seek leave of the Court to file their proposed Amended Complaint pursuant to the provisions of Federal Rules of Civil Procedure 15(a)(2), and the March 1, 2023 and March 20 Orders of the Court.

Plaintiffs have been advised and will fully comply with the filing directives ordered by the Court. Plaintiffs have prior to this second motion refiled their counsel's Entry of Appearance without any attachment thereto.

Plaintiffs will file as an attachment to this second motion the version of the Amended Complaint which they seek leave to file and any exhibits referenced in that proposed amended complaint, all of which will be contained in single PDF file as an attachment to this motion. This motion and attachment will be filed through the Court's Electronic Document Filing System and the proposed amendment fully disclosed to all parties

All of which is respectfully submitted.

/s/ Gary W. Gardenhire

Gary W. Gardenhire, OBA #3235

Attorney for Plaintiffs

1005 Fountain Gate Cir.

Norman, OK 73072

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2023, a true and correct copy of the foregoing Second Motion For Leave To File Amended Complain was served upon the following counsel via the Court's Electronic Document system, and/or U.S. Mail, postage prepaid thereon to:

Sara E. Potts
Doerner, Saunders, Daniel, *et al*
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-and-

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/s/ Gary W. Gardenhire